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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,
Plaintiff,
vs.
NICHOLAS LINDSEY,
Defendant.

2:11-CR-217-LDG-CWH

**DEFENDANT'S NOTICE OF EXPERT
WITNESS WILLIAM L. LEAVER**

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Nicholas Lindsey, the Defendant in this case, through his attorney, William C. Carrico, hereby requests, pursuant to Rule 16(b)(1)(C) of the Federal Rules of Criminal Procedure, and Rule 702 of the Federal Rules of Evidence, that the Defendant intends to call William L. Leaver as an expert witness at the trial of this matter. Mr. Leaver will provide testimony within the scope of Rules 702, 703, 704 and 705 of the Federal Rules of Evidence.

DATED this 1st of March, 2013.

RENE L. VALLADARES
Federal Public Defender

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/s/ *William Carrico*
By _____
WILLIAM CARRICO,
Assistant Federal Public Defender
Counsel for Nicholas Lindsey

SUMMARY OF TESTIMONY

Mr. Leaver will offer testimony, among other things, concerning all phases of questioned documents, including comparison of handwriting, comparison of hand printing mechanical and machine impressions documents, photocopiers, alterations and anonymous writings. All of the questioned documents have been made available to the Parties during the discovery process, and are relevant to the charges made in the Superseding Indictment on file in this case. In this case, this will include testimony concerning the integrity of the various "1003's" submitted as loan applications. Mr. Leaver will also offer the opinion that the Defendant is not the person who executed the false signatures on two of the "Zimney" loan packages.

BASIS FOR TESTIMONY

William L. Leaver holds a Bachelor's Degree in Criminal Justice Administration with a minor in Physics from Brigham Young University. He is a charter member of the Southwestern Association of Forensic Document Examiners, and a certified Diplomate of the American Board of Forensic Document Examiners.

Mr. Leaver has examined the known signatures of the Defendant Nicholas Lindsey and made comparisons of those known writings to various documents that are alleged to have been submitted to the alleged victims of the offenses alleged in this case.

QUALIFICATIONS, EXPERIENCE, AND TRAINING

Please see attached curriculum vitae of William L. Leaver, which by this reference is incorporated herein. See Ex. A.

DATED this 1st day of March, 2013.

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/ William Carrico

By WILLIAM CARRICO,
Assistant Federal Public Defender
Counsel for Nicholas Lindsey

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on March 1, 2013, she served an electronic copy of the above and foregoing
DEFENDANT'S NOTICE OF EXPERT WITNESS WILLIAM L. LEAVER by electronic
service (ECF) to the person named below:

DANIEL BOGDEN
United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101
BRIAN R. YOUNG
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ *Claudia V. Lopez*

Employee of the Federal Public Defender